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 and SAP LABS, LLC*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

TERADATA US, INC., TERADATA  
 CORPORATION, and TERADATA  
 OPERATIONS, INC.,

Plaintiffs,

v.

SAP SE, SAP AMERICA, INC., and SAP  
 LABS, LLC,

Defendants.

Case No. 3:18-CV-03670-WHO (JCS)

**STIPULATION AND ORDER  
 REGARDING CASE NARROWING &  
 EXPERT DISCOVERY SCHEDULE**

The parties attended a case management conference before this Court on June 12, 2020. The Court ordered the parties to submit a stipulation for narrowing the number of claims in this case. (ECF No. 267 at 2.) Thus, the parties have met and conferred and HEREBY STIPULATE and agree through their respective counsel of record to the following deadlines:

Event	Proposed Date
Teradata will narrow its trade secret case to no more than 25 trade secrets. SAP will narrow its patent case to no more than 25 claims.	December 15, 2020
Teradata will narrow its trade secret case to no more than 15 trade secrets from the set previously identified. SAP will narrow its patent case to no more than 15 claims from the set previously identified. Any change to the asserted trade secrets or patent claims after this deadline (with the exception of further reductions) can only be made through an Order of the Court by a showing of good cause.	Expert Discovery Cutoff

Pursuant to Civil L.R. 6-2, the parties have also stipulated to a change in the expert discovery schedule. Due to the number of experts in the case, the parties believe that additional time to work on responsive expert reports will be helpful. The current deadlines for expert discovery were issued by this Court in its initial scheduling order. (ECF No. 84.) These deadlines have not been modified since. Enlarging the amount of time for responsive expert reports will not have an effect on the rest of the schedule for this case, because the deadlines for fact discovery and dispositive motions remain unchanged. Thus, the parties have met and conferred and HEREBY STIPULATE and agree through their respective counsel of record to the following changes in the expert discovery schedule:

Event	Current Date	New Proposed Date
Fact Discovery Cutoff	January 15, 2021	January 15, 2021 (No Change)
Expert Disclosure	April 12, 2021	March 15, 2021
Expert Rebuttal	May 12, 2021	May 12, 2021 (No Change)
Expert Reply	None	June 11, 2021
Expert Discovery Cutoff	June 18, 2021	July 9, 2021
Dispositive Motions Heard By	August 25, 2021	August 25, 2021 (No Change)

1 Dated: July 10, 2020

Respectfully submitted,

2 By: /s/ Tharan Gregory Lanier  
3 Tharan Gregory Lanier

4 *Counsel for Defendants SAP SE, SAP AMERICA,*  
5 *INC., and SAP LABS, LLC*

6 Dated: July 10, 2020

Respectfully submitted,

7 By: /s/ Mark L. Whitaker  
8 Mark L. Whitaker

9 *Counsel for Plaintiffs Teradata Corporation,*  
10 *Teradata US, Inc., and Teradata Operations, Inc.*

11 It is SO ORDERED.

12 Dated: July 10, 2020

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14 William H. Orrick  
15 United States District Judge  
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**ECF ATTESTATION**

I, Mark L. Whitaker, hereby attest pursuant to Local Rule 5-1(i)(3) that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 10, 2020

By: /s/ Mark L. Whitaker

Mark L. Whitaker

*Counsel for Plaintiffs Teradata Corporation,  
Teradata US, Inc., and Teradata Operations, Inc.*